

# **EXHIBIT 11**

**Kathrin Bishop**

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**From:** Robbie Wright  
**Sent:** Friday, April 25, 2025 8:57 AM  
**To:** Aaron Wagner; Anthony Laporte; Huguenard, Harris; Bernick, Mike  
**Cc:** Alex Pierce; Nancy Martinez; Kathrin Bishop  
**Subject:** RE: Boyle deposition - Friday 4/25/25 - Needs to be passed

Harris and Mike,

Will you please provide available dates to reschedule this deposition? Please also provide dates for the other two purported experts as well.

Thanks,

**Robbie Wright**



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**From:** Aaron Wagner <awagner@kcozlaw.com>  
**Sent:** Monday, April 21, 2025 9:34 AM  
**To:** Anthony Laporte <ALaporte@hanszenlaporte.com>; Huguenard, Harris <hhuguenard@jw.com>; Bernick, Mike <mbernick@jw.com>  
**Cc:** Robbie Wright <rwright@kcozlaw.com>; Alex Pierce <APierce@hanszenlaporte.com>; Nancy Martinez <NMartinez@hanszenlaporte.com>; Kathrin Bishop <kbishop@kcozlaw.com>  
**Subject:** RE: Boyle deposition - Friday 4/25/25 - Needs to be passed

Counsel,

We concur with Anthony's statements that Friday will not go forward. As a reminder, that date was never agreed to by me and we've indicated multiple times that we would not be prepared to proceed Friday. Your production of nearly 8,000 pages of documents late Friday is also a consideration. We will look for some other times to depose your experts and will circle back with our dates of availability.

Thank you and I hope everyone had a good holiday weekend!  
Aaron

**Aaron Wagner**



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***Licensed to practice law in Washington, Oregon, Maryland, Texas, Florida, Georgia, and the District of Columbia.***

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**From:** Anthony Laporte <[ALaporte@hanszenlaporte.com](mailto:ALaporte@hanszenlaporte.com)>  
**Sent:** Monday, April 21, 2025 5:00 AM  
**To:** Huguenard, Harris <[hhuguenard@jw.com](mailto:hhuguenard@jw.com)>; Bernick, Mike <[mbernick@jw.com](mailto:mbernick@jw.com)>  
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**Subject:** [External] Boyle deposition - Friday 4/25/25 - Needs to be passed

Counsel,

I hope everyone had an enjoyable holiday weekend. Unfortunately, I have to pass on the deposition of Mr. Boyle set for this Friday, April 25, 2025. I start one trial on Tuesday in Matagorda County and another next Monday in Grimes County. Also, obviously, there are considerable disagreements amongst counsel as to the viability of the trial setting and the current Docket Control Order. Given all this, I will pass on the deposition of Mr. Boyle set for this Friday.

I fully recognize that it may be later argued that taking the deposition has been waived or similar opposition to rescheduling him down the road, but I will live with that outcome. For better or worse, Mr. Boyle will have to wait to be examined.

Thank you. Again, Mr. Boyle will NOT be deposed by me on Friday April 25, 2025. Do not have him appear.

Best,

Anthony

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